

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 22, 1996

Mr. William E. Kohr
Vice President, Operations
Great Lakes Gas Transmission Company
One Woodward Avenue Suite 1600
Detroit, Michigan 48226

CPF No. 36101M

Dear Mr. Kohr:

During August 15 through 18, 1995, representatives of the Central Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your pipeline facilities and records at Duluth, Minnesota.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and the probable violations are:

1. § 192.13(c) General.

Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.

Review of Great Lakes Gas Transmission's O&M procedural manual found the procedures were inadequate, as noted below. The procedures require expansion to include additional detail in regard to the following items, as reviewed with your personnel during the inspection:

- a) Remedial measures: Transmission lines, as specified in § 192.485.

- b) Transmission lines: Permanent repair of welds, as specified in § 192.715(b)(2).
- c) Pressure limiting and regulating stations: inspection and testing, as specified in § 192.739(a).

Great Lakes Gas Transmission Company has indicated by letter dated September 11, 1995, that the items listed above have been corrected. O&M Procedure OP71-31, Corrosion Control of Pipeline Facilities has been revised to indicate what remedial measures Great Lakes will take when corrosion is discovered. O&M Procedure OP71-86B, Permanent Repair of Girth Welds has been revised to indicate that in service welds may only be repaired if the pipeline is taken out of service or the line pressure is reduced to a stress level of 20 percent or less of the SMYS of the pipe. O&M Procedure OP71-52A, Testing Relief Valves and Other Pressure Limiting Devices has been revised to indicate what measures Great Lakes will take to determine the mechanical condition of pressure regulators.

In regard to the deficiencies in your written procedures for operations, maintenance, and emergencies, the Office of Pipeline Safety is issuing to you a Notice of Amendment requiring that your procedures be amended to comply with the requirements of the regulations referenced.

When it is found that an operator's procedures are inadequate, 49 C.F.R. §190.237 provides that the operator, after notice and opportunity for hearing may be required to amend its plans and procedures. This letter serves to provide you with the notice of the inadequate procedures and the response options as prescribed under §190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, the revised procedures you submitted by letter dated September 11, 1995, have been reviewed and are acceptable. No further action is required and this case will be closed.

Please refer to CPF No. 36101 in any correspondence or communication on this matter.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety